

1 **Thomas P. Riley, SBN 194706**
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
3 **First Library Square**
4 **1114 Fremont Ave.**
5 **South Pasadena, CA 91030**

6 **Tel: 626-799-9797**
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8 **TPRLA@att.net**

9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **J & J Sorts Productions, Inc.,**

14 **Plaintiff,**

15 **vs.**

16 **Felipe Cruz Manzano a/k/a Felipe G.**
17 **Cruz Manzano, individually and**
18 **d/b/a El Coyote Mexican Grill,**

19 **Defendant.**

20 **Case No. 5:08-cv-01872-RMW**

21 **REQUEST TO ENTER DEFAULT**

22 **TO: THE CLERK OF THE ABOVE-ENTITLED COURT:**

23 Plaintiff, J & J Sports Production, Inc., hereby requests that the Clerk of the
24 above-entitled Court enter default in this matter against Defendant **Felipe Cruz**
25 **Manzano a/k/a Felipe G. Cruz Manzano, individually and d/b/a El Coyote**
26 **Mexican Grill**, on the grounds that said Defendant has failed to appear or otherwise
27 respond to the Summons and Complaint within the time prescribed by the Federal Rules
28 of Civil Procedure.

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1 Said Defendant was duly served with the Summons and Complaint, evidenced by
2 the Proof of Service on file with this Court.

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5 Dated: May 30, 2008

/s/ Thomas P. Riley

6 **LAW OFFICES OF THOMAS P. RILEY, P.C.**

7 By: Thomas P. Riley

8 Attorneys for Plaintiff

9 J & J Sports Production, Inc.

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PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On May 30, 2008, I served:

REQUEST TO ENTER DEFAULT

On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Felipe Cruz Manzano (Defendant)
2766 Plumas Drive, #229
San Jose, CA 95121

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on May 30, 2008, at Los Angeles, California.

Dated: May 30, 2008

/s/ Emily Stewart
EMILY STEWART

1 **Thomas P. Riley, SBN 194706**
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
3 **One California Plaza**
4 **300 South Grand Avenue, Suite 2670**
5 **Los Angeles, CA 90071-3161**

6 **Tel: 213-229-9292**
7 **Fax: 213-229-9295**

8 **Attorneys for Plaintiff**
9 **J & J Sorts Productions, Inc.**

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **J & J Sorts Productions, Inc.,**

13 **Plaintiff,**

14 **vs.**

15 **Felipe Cruz Manzano a/k/a Felipe G.**
16 **Cruz Manzano, et al.**

17 **Defendant.**

18 **Case No. 5:08-cv-01872-RMW**

19 **AFFIDAVIT OF PLAINTIFF'S**
20 **COUNSEL IN SUPPORT OF**
21 **PLAINTIFF'S REQUEST TO**
22 **ENTER DEFAULT**

23 **To: The Clerk of the above-entitled Court:**

24 I, Thomas P. Riley, declare as follows:

25 1. I am the attorney for J & J Sorts Productions, Inc., in the above-entitled
26 action.

27 2. On May 9, 2008, Defendant was duly served with Summons and
28 Complaints and supplemental suit papers filed in this action.

3. On or about May 19, 2008, the Proof of Service, evidencing same was
filed with the Court.

PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is One California Plaza, 300 South Grand Avenue, Suite 2670, Los Angeles, California 90071. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On May 30, 2008, served:

**AFFIDAVIT OF PLAINTIFF'S COUNSEL IN SUPPORT OF
PLAINTIFF'S REQUEST TO ENTER DEFAULT**

On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Felipe Cruz Manzano (Defendant)
2766 Plumas Drive, #229
San Jose, CA 95121

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on May 30, 2008, at Los Angeles, California.

Dated: May 30, 2008

/s/ Emily Stewart
EMILY STEWART